

New

REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Betz Dearborn Inc EPA ID# ILD009722281

ALIAS SITE NAME(S): Betz Laboratories

CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: IL

REPORT DATED: 11/2000 REPORT TYPE: Memo

REPORT PREPARER: EPA - SF/RCRA SITE TYPE: \_\_\_\_\_ GAO ☒ IG

DISCUSSION/RATIONALE: "Lead Confirmed" - site deferral to  
RCRA is correct.

Special Initiative Flags entered.  
See attached.

Report Reviewed/  
Site Decision Made by: J. Huggins Date: 11/15/00

Region 5 Revision of EPA Form # 9100-3,11/00 - Special - IG Audit

EPA Region 5 Records Ctr.



293522

**RESOURCE CONSERVATION AND RECOVERY ACT HANDLERS  
ASSESSMENT**

For:

**Betz Dearborn Incorporated  
ADDISON, ILLINOIS**

**PREPARED BY:  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF LAND  
FEDERAL SITES REMEDIATION SECTION  
SITE ASSESSMENT UNIT**

**SEPTEMBER 2000**

## **Introduction**

On June 29<sup>th</sup>, 1999 the Illinois Environmental Protection Agency's (Illinois EPA) Site Assessment Program was tasked by the Region 5 offices of the United States Environmental Protection Agency (U.S.EPA) to undertake an initial assessment of a number of Resource Conservation and Recovery Act (RCRA) facilities within the State. These facilities are presently contained within the RCRA database but are not subject to RCRA's corrective action authorities and are currently referred to as RCRA "handlers". This RCRA Handlers Assessment Report is designed to identify facilities, which may pose a threat to human health or the environment, and to determine if placement of these facilities onto the Comprehensive Environmental Response, Compensation, and Liability Inventory System (CERCLIS) is warranted.

## **Site Description and History**

In the initial phase of this handlers report the author conducted a review of all Illinois EPA Bureau of Land files for the Betz Dearborn facility located at 333 South Lombard Road in the City of Addison, Illinois. It was found that the Betz Dearborn manufactures water treatment chemicals used for cleaning boilers and cooling towers. The company blends a variety of raw materials to meet the specifications of their customers. It was also discovered that Betz Dearborn transports and warehouses its products.

The facility covers about four and one-half acres located in an industrial area within the city. Operations at the current facility began in 1967 and have continued since then. The hazardous wastes generated from its operations primarily originate

from the cleaning of blending tanks and lines. No other information is available about the facility prior to 1967.

On August 9, 2000, personnel of the Illinois EPA Site Assessment Unit inspected the Betz Dearborn Incorporated facility. The inspection consisted of talking with Ernie Trippi, general manager of the facility. This author was escorted through the facility. Betz Dearborn is located in an industrial area within the southeast section of the city. This inspection revealed that all tanks and containers are surrounded by concrete berms. These berms were designed to contain material in the event of a spill. The drains within these berms are self-contained, designed to allow personnel of Betz Dearborn to pump any spilled material out of the drains and dispose of the material in the proper manner. The inspection also revealed that there were a few cracks in some of the berms but these cracks were minimal. There was some evidence of leaking material, but these materials were contained inside the berms. Generally, all identified Solid Waste Management Units (SWMSs) designed to contain hazardous wastes or hazardous materials at this facility appear to be sound.

### **Pathway Analysis**

Addison, Illinois obtains drinking water from wells drilled into the shallow bedrock aquifer system. The nearest public well is located approximately one-half mile east of the facility. The presence of a localized thick layer of clay in the unconsolidated deposits minimizes the likelihood that contamination would migrate from the glacial drift aquifer system into the shallow bedrock aquifer system. The potential for contamination entering the drinking water supply would appear to be low.

The nearest perennial surface water body is the DuPage River which is located approximately one and two tenths mile west of the facility. This review suggests that there would appear to be no direct overland flow path from the site to this surface water body.

Considering the time period of its operation, the fact that a the majority of the site is covered in concrete, that fact that no facility soil contamination has been documented in agency records, that a chain link fence restricts public access to the facility; the possibility of soil contamination leaving the site and entering the surroundings environs appear to be low.

Tanks are attached to air scrubbers to limit the possibility of a release via the air route. The cleaning area for the tanks is attached to a separate scrubber. Hazardous wastes are stored in a closed tank and an Illinois EPA Air Permit regulates the incinerator.

### **Conclusions and Recommendations**

Given the limited potential of contaminants from this site entering the environment through one of the established migration pathways, this reviewer has determined that this facility should continue to be regulated by the federal RCRA program, and not be entered in the Comprehensive Environmental Response Compensation and Liability Act's Information System database or the subject to any additional CERCLA investigative activities. This assessment has determined that any environmental concerns at this facility are not of a magnitude that would warrant CERCLA Removal or Remedial attention at this time.



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

September 18, 2000

Ms. Jeanne Griffin  
Emergency Response Branch  
Region V Offices  
Office of Superfund  
U.S. Environmental Protection Agency  
77 West Jackson  
Chicago, Illinois 60604

Dear Ms. Griffin:

Please find enclosed a copy of the Resource Conservation and Recovery Act Handlers Assessment Report and site recommendation for the following sites slated for completion in our Fiscal 2000 Site Assessment cooperative agreement.

SITE NAME	COUNTY	CERCLA RECOMMENDATION
Amoco Oil Co Main Office 006272629	Madison	No
Chemisphere Storage 180014839	Cook	No
Chicago Care Incorp 043905504	Cook	Yes
Gateway Petroleum 092358548	St. Clair	Yes
Carlisle Syntec Incorp 980503304	Bond	Yes
Gardner-Denver Copper 000814772	Adams	Yes
Barker Chemical Co 180014722	Cook	No
Flinn Ink Corp 006537245	Cook	No
Betz Dearborn Incorp 009722281	Cook	No
Federal Mogul 070686282	Cook	No
Fab-rite Metal Products 001837517	DuPage	No
Atwood Vacuum Machine 005163035	Winnebago	No
Commonwealth Edison 000806505	Will	No

We are pleased to provide you with the attached report. Should you have any questions or comments concerning this submission please feel free to contact me, or the authors of the specific report.

Sincerely,

Thomas Crause  
Manager, Site Assessment Programs  
Division of Remediation Management  
Illinois Environmental Protection Agency

GEORGE H. RYAN, GOVERNOR



# Superfund Site Assessment Data Management

EPA - Office of Emergency and Remedial Response

## Reporting RCRA Deferral Activities

July 2000

### What are RCRA Deferral Sites?

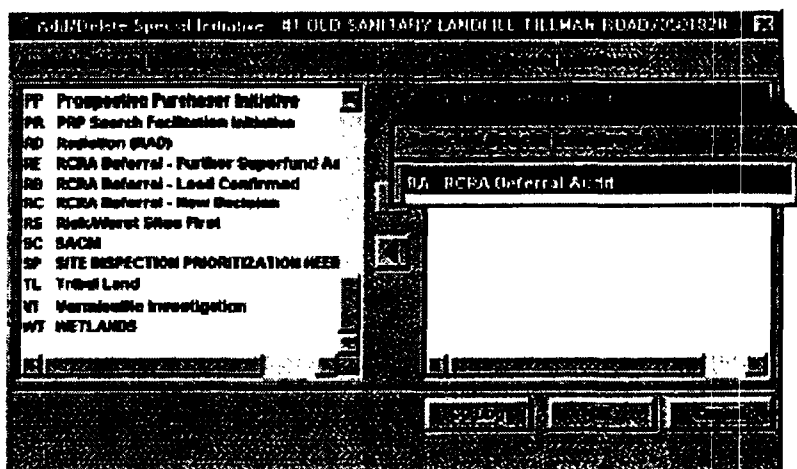
A March 1999 report by EPA's Office of the Inspector

General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA)

program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



EPA has developed two measures to track and evaluate these 2,099 sites in WastelAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives: RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WastelAN action, "Site Reassessment", that will track reassessment activities at sites.



### How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WastelAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.

### How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WastelAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WastelAN action.

### Who Can I Contact for More Information?

Jennifer Griesert Data Sponsor (703) 603-8888 griesert.jennifer@epa.gov  
WastelAN Techline (703) 247-4711 techline@marasconewton.com



rcradfrl.pdf

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Dufficy  
Brownfield/Early Action Section  
Superfund Division

Gerald Phillips  
Corrective Action Manager  
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) \*

cc: State Site Assessment Contacts  
EAPMs

\* FOR ATTACHMENTS PLEASE REFER TO THE FOLLOWING TWO SITE FILES:

AKZO COATINGS INC. 12D006390553

AG COMMUNICATION SYS. 12D005070545